ALINEDINST PC 777 S. FIGUEROA ST., STE. 2800 LOS ANGELES, CALIFORNIA 90017		Hartford O. Brown, Bar No. 190507 Jeffrey R. Groendal, Bar No. 254097 KLINEDINST PC 777 S. Figueroa St., Suite 2800 Los Angeles, California 90017	
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	4	(213) 406-1100/FAX (213) 406-1101 hbrown@klinedinstlaw.com	
	5	jgroendal@klinedinstlaw.com	
	6	Attorneys for Defendant and Counterclaimant, ACE RENT A CAR RESERVATIONS, INC., an Indiana corporation, erroneously sued as ACE RENT A CAR, INC.	
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	9	UNITED STATES DISTRICT COURT	
	10	CENTRAL DISTRICT OF CALIFORNIA	
	11	PI-NET INTERNATIONAL, INC.,	Case No. CV 12-04303 PSG (JEMx)
	12	Plaintiff,	DEFENDANT AND COUNTER-
	13	V.	PLAINTIFF ACE RENT A CAR RESERVATION, INC.'S RESPONSE
	14	ACE RENT A CAR, INC.,	TO OSC RE: WHY CASES SHOULD NOT BE STAYED PENDING INTER PARTES REVIEW
	15	Defendant.	
	16		Courtroom: 880-8th Floor
	17	ACE RENT A CAR RESERVATIONS, INC.,	Judge: Philip S. Gutierrez Magistrate Judge: John E. McDermott
	18	Counter-Claimant,	Complaint Filed: May 17, 2012 Trial Date: June 24, 2014
	19	, '	77 date 2 1, 2011
	20	V.	
	21	PI-NET INTERNATIONAL, INC.,	
	22	Counter-defendant.	
	23	Defendant and Counter-Plaintiff ACE RENT A CAR RESERVATIONS,	
	24	DIG 1 1 ACEDENTE A CAD DIG (((ACED) 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1	
	25	INC., erroneously sued as ACE RENT A CAR, INC. ("ACE") hereby provides its	
	26	response to the Court's Order to Show Cause Re: Why This Case Should Not Be	
	27	Stayed (Docket No. 42, June 5, 2013)("OSC").	
	28		
		- 1 - DEFENDANT AND COUNTER-PLAINTIFF ACE RENT A CAR RESERVATION, INC.'S RESPONSE TO	
			D NOT BE STAYED PENDING INTER PARTES REVIEW

CV 12-04303 PSG (JEMx)

ACE believes this case should be stayed pending the resolution of the *inter* partes review of the Patents-in-Suit, filed by non-party SAP America, Inc. To that end, on May 29, 2013, ACE filed a Motion to Stay Pending *Inter Partes* Review (Docket Nos. 41, 41-1 through 41-8; May 29, 2013).

In light of same and the Court's recent order staying the cases *Pi-Net*International, Inc. v. The Hertz Corporation, et al., CV 12-10012 PSG (JEMx); *Pi-Net International, Inc. v. Avis Budget Group, Inc., et al.*, CV 12-4036 PSG

(JEMx); and, *Pi-Net International, Inc. v. Dollar Thrifty Automotive Group, Inc., et al.*, CV 12-4270 PSG (JEMx), ACE believes it is appropriate to stay this matter until resolution of the *inter partes* review.

Respectfully Submitted,

## KLINEDINST PC

DATED: June 11. 2013

Bv: <u>/s/ Hartford O. Brown Hartford O. Brown</u>

Jeffrey R. Groendal Attorneys for Defendant and Counter-

Plaintiff,

ACE RENT A CAR RESERVATIONS, INC., an Indiana corporation, erroneously sued as ACE RENT A CAR, INC.

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